



**The School District of Philadelphia
PCB Transformer Compliance Project
Progress Report #115
October 1, 2016**

As required by Paragraph V.16 of the Consent Decree between the USEPA and The School District of Philadelphia, this document is the 115th bi-monthly progress report. This report addresses the following subjects:

- The Work completed and the actions that have been taken toward achieving compliance with the Consent Decree;
- For the next 2 months, a description of all data anticipated to be developed and activities which are scheduled;
- A description of any problems encountered or anticipated;
- The actions which have been taken to prevent or mitigate those problems which have been encountered or are anticipated;
- A schedule for when actions relative to problems anticipated or encountered will be completed; and
- All modifications to the Work and schedule that have been made in accordance with this Consent Decree during the reporting period.

I. Status of Consent Decree

The Consent Decree was authorized by The Board of Education at a Board Meeting on March 10, 1997, and was executed on March 13, 1997. On August 13, 1997, the comment period expired and the U.S. Attorney's office filed a motion for entry of the Consent Decree with the U.S. District Court for the Eastern District of Pennsylvania. The Consent Decree was entered by the Court on September 12, 1997.

II. Work Completed

The following summarizes the major items recently completed (August through September of 2016) that are relevant to the Consent Decree.

1. The inspection of the PCB transformers at the Northeast High School was performed on August 23, 2016 and appropriate documentation was provided to the School District.
2. The School District continues to plan for the removal of the six PCB transformers at Northeast High School. Construction documents which define the work to be completed are in preparation.
3. On September 14, 2015, 10 discrete samples of the encapsulated concrete floor at the Strawberry Mansion High School were obtained for laboratory analysis. In addition, wipe samples collected prior to and upon completion of the acquisition of the floor samples were obtained. These samples were associated with the evaluation of conditions following the release of PCB fluids that occurred during the 2014 replacement of the PCB transformers from this location. These samples were collected by a subcontractor to Carr & Duff, Inc. (Carr & Duff held the contract with the School District for the replacement of the PCB



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transformers at this location.) A laboratory data report for these samples was received by the School District on September 28, 2015. The analytical data confirmed the presence of PCBs at concentrations which exceeded regulatory standards.

4. On November 25, 2015, Carr & Duff removed the investigatory derived waste from the Strawberry Mansion High School. This material was generated during the collection of the samples discussed above. Carr & Duff has been provided with comments on certain waste profile documents which they submitted to the School District. The School District has not yet received the final disposal documentation from Carr & Duff.
5. On August 30, 2016, Carr & Duff provided to the School District their proposed Remedial Action Work Plan for the encapsulated floor area at Strawberry Mansion High which is currently being reviewed. The Remedial Action Work Plan outlines the proposed means and methods involved with the removal, handling and disposal of impacted concrete and waste materials.
6. As previously reported, a "Final Report" for the recent remedial actions at the Strawberry Mansion High School was completed and provided to USEPA on November 24, 2014. This report includes a Certification of Completion by the School District's PCB Coordinator. This report is now pending formal USEPA approval.
7. As previously reported, "Final Reports" (i.e., 2008-2009 time frame) have been submitted to the USEPA for the following locations: Mastbaum Technical High School (September 2008), *old* Roberto Clemente School (January 2009), Northeast High School (January 2009) and George Washington High School (May 2009). These reports are pending USEPA review. Deed notifications for George Washington High School and Northeast High School have been officially recorded with the City of Philadelphia and were forwarded to USEPA to complete the "Final Reports" for these locations. The deed notification for Mastbaum Technical High School was recorded with the City of Philadelphia on October 11, 2013.
8. As previously reported, "Final Reports" for South Philadelphia High School, Overbrook High School, Roxborough High School, Randolph Skill Center and Central East Middle School have been reviewed by USEPA. "Final Reports" associated with the encapsulation activities at Wanamaker Middle School, Strawberry Mansion High School (original issue, February 1998) and Girls' High School have also been reviewed by USEPA, although the Wanamaker Middle School is no longer owned by the School District. USEPA has found all of the above "Final Reports" to be acceptable and no revisions are required; however, the formal approval of these reports is dependent upon the School District providing the additional information which is identified in a correspondence dated July 3, 2006 from USEPA's John Ruggero, Esq. to the School District's Elizabeth Gutman, Esq. The School District's actions with respect to the July 3, 2006 correspondence are summarized below:
 - The USEPA's letter of July 3, 2006 noted that "encapsulation training" for building engineers and School District employees had not been completed or verified at the



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following locations: Central East Middle School, Randolph Skill Center, Girls' High School and Strawberry Mansion High School. As reported within Progress Report #68, training sessions were conducted for school district employees by Access Training, Inc. on February 27 and 28 and March 1, 2007. Sign in sheets and the Power Point presentation used during the sessions were provided to EPA by counsel on July 29, 2008.

- The USEPA's letter of July 3, 2006 noted that as part of the Final Reports which had been submitted, documentation or waste manifests for final disposal of PCB-contaminated materials had not been provided for the following locations: Central East Middle School, Randolph Skill Center and Roxborough High School. Disposal documentation for these three locations has been provided to the USEPA (Roxborough High School via KEM Partners' letter of August 12, 2008; Central East Middle School and Randolph Skill Center via separate KEM Partners' letters dated August 18, 2008).
- Deed notifications for those locations where PCB encapsulated concrete is present have been officially recorded with the City of Philadelphia (Central East Middle School, Girls' High School, Overbrook High School, Randolph Skill Center and Strawberry Mansion High School for the event that occurred prior to 1997). These deed notifications were provided to the USEPA via correspondence dated August 27, 2010. The deed notifications for Roxborough High School and South Philadelphia High School were recorded with the City of Philadelphia on September 26, 2013 and October 15, 2013, respectively. (It is noted that the deed notification associated with the Wanamaker Middle School was completed and found acceptable). It is noted that the June 2010 recorded deed notification for Strawberry Mansion High School was based upon the PCB Removal and Disposal Plan that focused on the concrete that was epoxy encapsulated in 1997. As a result of the additional concrete that was encapsulated at the Strawberry Mansion HS during August of 2014, a second deed notification was finalized as noted above.

III. Next 2 Months Anticipated Activities

The following activities are anticipated to occur during October and November of 2016:

1. The School District will provide comments to Carr & Duff on their proposed Remedial Action Work Plan for the encapsulated floor area at the Strawberry Mansion High School.
2. The School District will advance the construction documents associated with the removal of the six PCB transformers from Northeast High School.
3. The visual inspection of School District owned PCB transformers at the Northeast High School for the 3rd quarter of 2016 may be completed.



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IV. A Description of Any Problems Encountered or Anticipated

1. None.

V. Actions Taken to Prevent or Mitigate the Above Encountered or Anticipated Problems

1. None.

VI. The Schedule for Taking Actions to Prevent or Mitigate Encountered or Anticipated Problems

1. None.

VII. Modifications to the Work and Schedule Which Have Been Made in Accordance with the Consent Decree During This Reporting Period

1. None.